

I am against eliminating Morse Proficiency testing from the General and Extra licensing requirements. The written exams for all classes of license are too easy. The correct answers to most questions can be arrived at by exercising common sense. Answers to technical questions can easily be memorized, as the question pools are made public. It seems as though the only work that one must do to get an amateur radio license is to learn Morse code. This petition addresses issues of homeland security and the "expansion of the existing reservoir within the amateur radio service of trained operators, technicians and electronics experts". Making it easier to obtain and/or upgrade an amateur radio license is not going to expand the existing reservoir within the amateur radio service of trained operators, technicians and electronics experts. On the contrary, such an action will only attract the non-technical and those who know little or nothing about electronics to the amateur radio service. Dumbing down amateur radio will serve no constructive purpose.

In a day and age where Morse code is no longer the cutting edge, or even the norm for radio communications, it still serves a purpose in the amateur radio service. Morse proficiency promotes homebrewing of radio equipment. CW radio equipment is simpler and more economical to build than SSB equipment. Building working radio equipment enables one to learn about radio and electronics with hands-on experience. Once the homebrewer gets his/her feet wet building CW equipment, that person is able to graduate to more complicated things like SSB, digital, etc. Homebrewing a simple CW transceiver starts an amateur off in the direction of further experimentation. If we amateurs are to develop new technologies, as we did in the past, we must crawl before we can walk. Homebrewing CW radio gear is the first step in that process. Successfully building a first radio sparks a thirst for experimentation. Without CW proficiency, there is no incentive to homebrew a CW radio. Why build one if you can't use it?

In response to some of No Code International's arguments:

*** "Virtually no government or commercial radio service uses Morse telegraphy in today's world."

We are the Amateur Radio Service. What we do sets us apart from governmental and commercial services. The Amateur Radio Service exists for hobby purposes, to maintain a pool of electronic experts as a national resource and to advance and further the radio art.

*** "Morse skills are no longer required for effective emergency communications by amateur operators."

While this is mostly true, CW is still a very efficient mode of communication that requires only the simplest of radio equipment, and that can get a message through when voice modes fail. As efficient as the digital modes are, a computer is required for their use. Such is not the case with CW. In a disaster, when infrastructure is down or even destroyed, all that is needed to pass emergency or health/welfare traffic is a simple low-power CW transceiver that is capable of operating from a small square 9-volt battery.

*** "The maintenance of Morse proficiency tests as a requirement for any amateur radio license is no longer in accord with the purpose of the Amateur Radio service and serves no legitimate regulatory purpose".

See paragraph 2 of my comment about homebrewing.

*** "The maintenance of the Morse requirement appears to be contrary to one of the Commission's statutory mandates. ... NCI believes that the maintenance of outdated Morse requirements has been the biggest single impediment to the recruiting of otherwise qualified 'new blood' (the more technically inclined and the younger generation in particular) into the Amateur Radio service."

Today's Morse proficiency requirement is a mere 5 words per minute. Anybody with any kind of commitment to learning 5 wpm Morse code can succeed at meeting this requirement. Morse proficiency testing has not kept anyone with a true desire for amateur radio from attaining the level of license that such persons have desired to attain. Those who say that they can't learn Morse code at the level of 5 wpm simply won't learn it. I ask the Commission not to buckle to pressure from NCI and those who identify with NCI to eliminate Morse proficiency testing merely because a segment of society refuses to learn Morse code. Amateur radio isn't for everybody. The rules shouldn't be changed just to accommodate those who have a strong dislike for one of the licensing requirements.

*** "Even the IARU recognizes that continuing Morse proficiency requirements is not in the best interest of the future of the Amateur Radio Service. ... While NCI's Board of Directors do not profess to be mind readers, it is difficult to conceive of any reason for the IARU - historically a very pro-Morse proficiency testing organization - to adopt such a resolution, except in final recognition that Morse proficiency requirements for access to the bands below 30 MHz are very detrimental to the future health of amateur radio and to pave the way for the elimination of such requirements from national regulations on a global scale by first removing the requirement from the ITU radio regulations."

The above statement from NCI is pure speculation. Who is NCI to put words in the mouths of the IARU? All that was done at WRC 2003 was to remove mandatory Morse proficiency testing from international treaty and leave the decision to either continue Morse proficiency testing or not to each sovereign nation's administration. This is what the nations of the world agreed to. Had the proposal to eliminate Morse proficiency testing from international treaty been on an "all-or-none" basis (whether all countries agree to either keep or drop Morse proficiency testing), the outcome of such a vote might have been vastly different.

*** "Other administrations have already eliminated Morse test requirements and many more are expected to follow suit."

This is also pure speculation. As of today, only a small handful of administrations have eliminated Morse proficiency testing from their licensing requirements. Only time will tell if NCI's prediction comes true. It is my belief (although this is pure speculation as well) that most administrations will opt to keep Morse proficiency testing as a licensing requirement.

*** "The Commission is no longer bound by an unwaivable requirement in the ITU radio regulations and should act promptly to remove any unnecessary, restrictive requirement."

No, the Commission isn't bound by an unwaivable requirement in the ITU radio regulations. However, there is no reason or urgency to remove the Morse proficiency requirement.

*** "The Commission has the authority to amend its Part 97 rules to eliminate Test Element 1 by expedited order without formal notice and public input'"

The Commission does have such authority, but it is not in the best interest of the parties concerned. We do not live in a totalitarian dictatorship where the government has absolute power. It is in the best interest of the Commission to let the democratic process run its course and come to an educated and informed decision based on what is best for the United States, the Amateur Radio Service and all parties concerned.

*** "Specific relief requested:

- Eliminate the Element 1 Morse test totally from the commission's rules for all license classes.
- Since the only testing distinction between the Technician class and the (grandfathered) Technician Plus class is the Element 1 Morse test, modify as a consequential and logical change, the privileges afforded to Technician class licensees to be equivalent to those currently afforded to Technician Plus licensees and 'Technician with Morse credit' licensees.

I am against the elimination of Element 1 testing from the General and Extra class licensing requirements. See the first paragraph of my comment. I am not against granting Technician class licensees all privileges of the Technician Plus and 'Technician with Morse credit' privileges. I would go even further and grant Technician class licensees some limited phone privileges on some of the HF bands in accordance with the RM-10781 proposal, as limited HF privileges for Technicians would encourage many Technicians to learn CW and upgrade to General and Extra.

Respectfully Yours,

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